

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION

IN RE:	§	CASE NO. 22-90147
Christopher Callaway	§	
	§	Chapter 13
SSN(s) xxx-xx-2517	§	
320 Zed Creek Rd.	§	
Lufkin, Texas 75904	§	
Debtor	§	

APPLICATION TO RETAIN SPECIAL COUNSEL

**14-DAY NEGATIVE NOTICE – LBR 2014(a):**

**Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have on in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.**

**No hearing will be conducted on this Application unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE shown in the certificate of service unless the Court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any matter.**

TO THE HONORABLE JUUDGE OF SAID COURT:

COMES NOW CHRISTOPHER CALLAWAY, Debtor, hereinafter called Movant, and respectfully shows the Court the following:

1. Movant filed his Chapter 13 Petition on July 21, 2022.

2. The Movant has a claim pending against Union Standard Insurance Group arising out of an automobile accident which occurred on August 3, 2022 in Angelina County, Texas. The nature of the claim and anticipated lawsuit is for injuries and damages sustained by Movant as a result of the referenced automobile accident.

3. The Movant desires to employ Jeff B. Badders and Mari E. Badders of the law firm of Badders Law Firm, P.C., to represent the interests of Movant, if any, and the above entitled bankruptcy estate to prosecute the claim against Union Standard Insurance Group in the above described claim and potential lawsuit. The attorneys have had experience in matters of this character and Movant believes that the attorneys are qualified to represent him in this matter. The attorneys represent no interest adverse to the Chapter 13 Trustee or this bankruptcy case and their employment would be in the best interest of this bankruptcy case. The prosecution of this claim and potential cause of action are necessary for the successful reorganization of the Movant. The attorneys' mailing address, state bar numbers, telephone numbers and e-mail addresses are set forth below.

4. The professional services to be rendered by the above-named attorneys would include the following:

- a. To assist the Movant in the handling of this claim and potential lawsuit.
- b. To perform all other legal services for Movant in connection with this and directly related matters which may be necessary and in the best interest of the Movant's bankruptcy case.

5. There are no other attorneys employed pursuant to the previous Court Order by the Movant with regard to this matter.

6. After the performance of such legal services, or during the performance, upon proper application, the above-named attorneys should be allowed reasonable compensation for services rendered as follows:

- a. Forty percent (40%) plus interest from total recovery, along with reimbursement of all related costs expended in prosecuting this claim.

Wherefore, Movant prays that he be authorized to employ and appoint Jeff B. Badders and Mari E. Badders of the law firm Badders Law Firm, P.C., to represent the Movant in connection with the above-referenced claim and potential lawsuit, and that he receives such other and further relief as is just.

Respectfully submitted,

**BADDERS LAW FIRM, P.C.**

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/s/ Mari Badders  
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Attorneys for Movant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was forwarded to the following parties by certified mail, return receipt requested and by regular mail to the parties listed on the attached matrix mailing list on this the 8<sup>th</sup> day of March 2023.

U.S. Trustee  
110 N. College, Ste. 300  
Tyler, Texas 75702

Lloyd Kraus  
Chapter 13 Trustee  
Plaza Tower  
110 N. College, Ste. 1200  
Tyler, Texas 75702

Christopher Callaway  
320 Zed Creek Rd.  
Lufkin, Texas 75904

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/s/ Mari Badders  
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Attorneys for Movant